

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION

Hon. Robert Kugler
Magistrate Karen Williams
Special Master Thomas Vanaskie

This Document Relates to:

Civil Action No. 1:19-md-2875-RBK-JS

All Actions

DECLARATION OF MARLENE J. GOLDBERG

I, Marlene J. Goldenberg, hereby declare as follows:

1. I am an attorney of the State of Minnesota, a member of good standing of the bar of this Court, and am employed with the law firm GoldenbergLaw, PLLC, counsel to Plaintiffs.
2. I make this Declaration on behalf of Plaintiffs in support of their Reply in Support of *Daubert* Motion to Preclude Defense Expert William J. Lambert, Ph.D. From Offering Class Certification Opinions.
3. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the transcript from the deposition of Dr. William Lambert.
4. Attached hereto as **Exhibit 2** is a true and correct copy of *In re Paulsboro Derailment Cases*.
5. Attached hereto as **Exhibit 3** is a true and correct copy of APL-MDL-2875-0388792.
6. Attached hereto as **Exhibit 4** is a true and correct copy of the transcript from the deposition of Dr. Ambati Rama Mohana Rao.

7. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the transcript from the deposition of Blessy Johns.
8. Attached hereto as Exhibit 6 is a true and correct copy of the transcript from the deposition of Sanjay Singh.
9. Attached hereto as Exhibit 7 is a true and correct copy of APL-MDL 2875-2076260.
10. Attached hereto as Exhibit 8 is a true and correct copy of APL-MDL 2875-2803459.

I, Marlene J. Goldenberg, declare under penalty of perjury that the foregoing is true and correct.

Executed on June 16, 2022.

/s/ Marlene J. Goldenberg
Marlene J. Goldenberg